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January 9, 2015

The Honorable Lewis A. Kaplan, U.S.D.J.
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: ICBC (London) plc v. The Blacksands Pacific Group, Inc.
Case No. 15-CV-0070 (LAK) (FM)

Dear Judge Kaplan:

We are counsel of record for Defendant The Blacksands Pacific Group, Inc. and respectfully request a 30 day extension of the deadline set forth in Fed. R. Civ. Proc. 81(c)(2)(C). Plaintiff commenced this lawsuit in Supreme Court, New York County on December 8, 2014 under NY CPLR 3213 and we removed the action to the Southern District of New York on January 7, 2015. Pursuant to Fed. R. Civ. Proc. 81(c)(2)(C), Defendant has until January 14 to Answer Plaintiff's "initial pleading stating the claim for relief."

Defense counsel needs additional time because we were only retained as counsel for Defendant last week and we are still reviewing the facts of this case. My firm had no prior relationship with the Defendant (which is located in Los Angeles, California) and no familiarity with the underlying dispute. On the same day we removed the case, we asked Plaintiff's counsel for an extension of time. This afternoon, Plaintiff agreed to extend our time by seven days to January 21, but refused our request for a 30 day extension. We therefore respectfully request that Your Honor extend our time under in Fed. R. Civ. Proc. 81(c)(2)(C) to February 6, 2015.

Respectfully,


Kevin J. Fee

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(By hand and by e-mail)